UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

CASE NO.: 1:22-cv-23604-KMM

DANNY FLYNN,

Plaintiff,

v.

ZOETOP BUSINESS CO., LIMITED, a Hong Kong limited company and SHEIN DISTRIBUTION CORP., a Delaware corporation,

Defendants.

PLAINTIFF'S NOTICE OF ACCEPTANCE OF OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Plaintiff Danny Flynn ("Plaintiff"), hereby accepts and provides notice that he accepts Defendant SHEIN DISTRIBUTION CORP.'s ("Defendant") Offer of Judgment dated March 16, 2023. A copy of the Offer of Judgment is attached hereto as **Exhibit 1**. Accordingly, Plaintiff respectfully requests that judgment be entered against Defendants SHEIN DISTRIBUTION CORP. and ZOETOP BUSINESS CO., LIMITED, including the terms set forth in Exhibit 1.

Dated: March 23, 2023 Respectfully submitted,

/s/ Layla T. Nguyen

LAYLA T. NGUYEN

Florida Bar Number: 1024723

layla.nguyen@sriplaw.com

JOEL B. ROTHMAN

Florida Bar Number: 98220 joel.rothman@sriplaw.com

SRIPLAW, P.A.

21301 Powerline Road

Suite 100

SRIPLAW

Boca Raton, FL 33433 561.404.4350 – Telephone 561.404.4353 – Facsimile

Counsel for Plaintiff Danny Flynn